

Accompanying Statement to Annual CPNI Compliance Certification for Adaption Technologies Ventures, Ltd.

In compliance with 47 C.F.R. § 64.2009(e), I, Todd Wilkens, acting on behalf of Adaption Technologies Ventures, Ltd., certify the Company has taken the following actions:

Employee Training and Discipline

- Trained all employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.
- The Company considers CPNI to be Company confidential information and treats it as such.

Sales and Marketing campaigns

- Management approves all sales and marketing campaigns.

Record-Keeping Requirements

- Established a system to maintain a record of all sales and marketing campaigns that use their customers' CPNI, including marketing campaigns of affiliates and independent contractors.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. The Company has no marketing or sales partnerships that require use of CPNI. in the previous year
- Made certain that these records are maintained for a minimum of one (1) year.

Establishment of a Supervisory Review Process

- Established a supervisory review process for all outbound marketing situations and all sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

Opt-In

- .Opt-in is the default status for a customer
- CPNI is entered online by either the Customer or an authorized agent on behalf of the customer and is password protected and some items encrypted.

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Opt-Out Mechanism Failure

- Established a protocol through which the Company will provide the FCC with written notice within five (5) business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. It is only available online to the customer and Company account maintenance functions who must first present a valid account name and password. The password is one of their choosing when their account access credentials are established and the customer may change this at any time. Access logs are maintained for at least one year.

Customer Notification of CPNI Changes

- Changes to the Customers account access information; mailing address, email address or contact information will generate a confirmation email that is sent to the original and new email address of record.

Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ("LEA") is notified of any unauthorized access to a customer's CPNI. In compliance with 47 C.F.R. § 64.2009(e), No actions were taken against databrokers within the last year.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of 2 years.

S u m m a r y o f Customer Complaints regarding CPNI

In compliance with 47 C.F.R. § 64.2009(e), a summary of customer complaints received within the last year:

- 1) The Company has received no complaints as a result of improper access by employees.
- 2) The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information
- 3) The Company has received no complaints as a result of instances of improper access to online information by individuals not authorized to view the information.
- 4) In addition, the Company is aware of no processes pretexters are using to attempt to access CPNI, or what steps other carriers are taking to protect CPNI.